

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA §
§
v. § CRIMINAL NO. 1:20CR79 (1)
§
JONATHAN LIMBRICK (1) §

ELEMENTS OF THE OFFENSE

You are charged in Count One of the Indictment with a violation of Title 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute a Mixture or Substance Containing a Detectable Amount of a Schedule II Controlled Substance, Namely Methamphetamine.

For you to find the defendant guilty of this crime, you must be convinced that the government has proved each of the following beyond a reasonable doubt:

First: That two or more persons, directly or indirectly, reached an agreement to possess with intent to distribute a mixture or substance containing a detectable amount of a Schedule II controlled substance, namely methamphetamine;

Second: That the defendant knew the unlawful purpose of the agreement;

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose;

Respectfully submitted,

NICHOLAS J. GANJEI
ACTING UNITED STATES ATTORNEY

/s/ Russell E. James

Russell E. James

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was delivered to Brian Roberts, counsel of record, via electronic filing on March 18, 2021.

/s/Russell E. James
Russell E. James
Assistant United States Attorney